

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Removal of TRA-670 RadCon Hood TRA H-31

SECTION B. Project Description and Purpose:

The Test Reactor Area (TRA)-670 RadCon Hood (TRA H-31 US Government Property Identification Number 218090) is no longer in use and needs to be removed and disposed. The hood is located in TRA-670 Room 106 against the west wall. The change will include removing the hood and the HEPA filter housing and some additional exhaust duct modifications. Minor changes to Low-Pressure Demineralized Water (LDW), Warm Waste Drain, Compressed Air, Electrical Distribution, and Service Domestic Water systems will be required once the hood is removed i.e., isolating or capping service lines.

The hood was used to count radioactive samples, and the project has the potential to generate low-level radioactive waste (LLW) and mixed low-level waste (MLLW). The MLLW generated during this project will be sent to a commercial offsite RCRA-permitted TSD facility that is approved for treatment and disposal of radiologically contaminated MW (e.g., Clive, Utah). The LLW will be disposed at the Nevada National Security Site (NNSS). The environmental impacts of transferring low level waste from the INL to the NNSS were analyzed in the 1996 Nevada Test Site EIS (DOE/EIS-0243) and supplemental analysis (SA) (DOE/EIS-0243-SA-01) and DOE's Waste Management Programmatic EIS (DOE/EIS-200). The fourth Record of Decision (ROD) (65 FR 10061, February 25, 2000) for DOE's Waste Management Programmatic EIS established the Nevada National Security Site as one of two regional LLW and MLLW disposal sites. The SA considers additional waste streams, beyond those considered in the 1996 NTS EIS, that may be generated at or sent to the Nevada National Security Site for management.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Project activities could result in fugitive dust.

Disturbing Cultural or Biological Resources

TRA-670 (ATR Reactor Building) is eligible for nomination to the National Register of Historic Places and is considered a Category 1 historic property. Removal and/or changes of original features may adversely impact this historic architectural property; however, the project activities are exempt and may proceed as described without further cultural resource review. The described project activities fall under exemptions 2 (routine maintenance activities) and 8 (internal reconfiguration of active laboratories) listed in Table 2 (Idaho National Laboratory Cultural Resource Management Office. Idaho National Laboratory Cultural Resource Management Plan. DOE/ID-10997, revision 6, Idaho Falls, Idaho: U.S. Department of Energy, Idaho Operations Office, 2016, pg. 51).

Generating and Managing Waste

The proposed action has the potential to generate the following types of waste:

- Industrial (non-hazardous, non-radioactive) waste including boxes, wood, wiring, paper, insulation, and some metals.
- Hazardous waste from systems or equipment containing hazardous chemicals, or by using hazardous chemicals to clean or decontaminate equipment and systems. Hazardous metal waste (e.g., lead, electronics, brass, metal containing paints, etc.) could also be generated.
- Low level radioactive waste from hood components.
- Mixed low level waste from chemicals used to decontaminate equipment.

Releasing Contaminants

There is the potential to release small amounts of contaminants to the environment during project activities. Although not expected, small spills (e.g., paint) may occur. Releases would be cleaned up, and notifications to the Facility Manager, Spill Notification Team, and Environmental Support would be made.

Using, Reusing, and Conserving Natural Resources

All materials would be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow.

SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification: Identify the applicable categorical exclusion from 10 Code of Federal Regulation (CFR) 1021, Appendix B, give the appropriate justification, and the approval date.

For Categorical Exclusions (CXs), the proposed action must not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, or similar requirements of Department of Energy (DOE) or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment or facilities; (3) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-

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excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources (see 10 CFR 1021). In addition, no extraordinary circumstances related to the proposal exist that would affect the significance of the action. In addition, the action is not "connected" to other action actions (40 CFR 1508.25(a)(1) and is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1608.27(b)(7)).

References: 10 CFR 1021, Appendix B to Subpart D, B1.24 "Property transfers"

Final Waste Management Programmatic Environmental Impact Statement [WM PEIS] (DOE/EIS-0200-F, May 1997)

Final Environmental Impact Statement for the Nevada Test Site and Off-Site Locations in the State of Nevada (DOE/EIS-0243) and supplemental analysis (SA) (DOE/EIS-0243-SA-01).

Justification: Project activities are consistent with 10 CFR 1021, Appendix B to Subpart D, B1.24 "Transfer, lease, disposition, or acquisition of interests in personal property (including, but not limited to, equipment and materials) or real property (including, but not limited to, permanent structures and land), provided that under reasonably foreseeable uses (1) there would be no potential for release of substances at a level, or in a form, that could pose a threat to public health or the environment and (2) the covered actions would not have the potential to cause a significant change in impacts from before the transfer, lease, disposition, or acquisition of interests."

The environmental impacts of transferring low level waste from the INL to the Nevada National Security Site were analyzed in the 1996 Nevada Test Site EIS (DOE/EIS-0243) and supplemental analysis (SA) (DOE/EIS-0243-SA-01) and DOE's Waste Management Programmatic EIS (DOE/EIS-200). The fourth Record of Decision (ROD) (65 FR 10061, February 25, 2000) for DOE's Waste Management Programmatic EIS established the Nevada National Security Site as one of two regional LLW and MLLW disposal sites. The SA considers additional waste streams, beyond those considered in the 1996 NTS EIS, that may be generated at or sent to the Nevada National Security Site for management.

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act) Yes No

Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on: 7/26/2017